

Hon. James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DANIEL ESPINOZA,

Plaintiff,

v.

THE CITY OF SEATTLE, WASHINGTON,
and LIEUTENANT THOMAS MAHAFFEY,
individually,

Defendants.

No. C17-01709-JLR

**STIPULATION AND [PROPOSED]
ORDER AMENDING ORDER
REGARDING INITIAL DISCLOSURES
AND JOINT STATUS REPORT**

[CLERK'S ACTION REQUIRED]

COME NOW the parties, Plaintiff Daniel Espinoza, represented by Thomas G. Jarrard and Matthew Z. Crotty, and Defendant City of Seattle, represented by Assistant City Attorney David Bowman, and stipulate to amendment of the Court's Order Regarding Initial Disclosures and Joint Status Report dated December 8, 2017, by establishing the following dates for initial disclosure and submission of the Joint Status Report and Discovery Plan:

Deadline for FRCP 26(f) Conference: 1/12/2018

Initial Disclosures Pursuant to FRCP 26(a)(1): 1/26/2018

Combined Joint Status Report and Discovery
Plan as Required by FRCP 26(f)
and Local Civil Rule 26(f): 2/2/2018

STIPULATION AND ORDER AMENDING ORDER REGARDING
INITIAL DISCLOSURES AND JOINT STATUS REPORT
(C17-01709-JLR) - 1

Peter S. Holmes
Seattle City Attorney
701 Fifth Avenue, Suite 2050
Seattle, WA 98104-7097
(206) 684-8200

5

The parties make this request on the following grounds pursuant to Local Civil Rule 16(b)(4): On December 5, 2017, by stipulation of the parties the Court ordered an extension time for Defendant City of Seattle to file its Answer to Plaintiff's Complaint, to January 5, 2018. Although the parties do not wish to cause any unnecessary delay to the case and are proceeding diligently to connect with witnesses and ascertain what documents will be needed to support their respective claims and defenses, Defendants need additional time to prepare for the Rule 26(f) initial discovery conference and initial disclosures due to the scope of potential witnesses, documents and information that must be identified and sought. The parties respectfully ask that the Court find good cause exists to modify its Order Regarding Initial Disclosures and Joint Status Report.

DATED this 12th day of December, 2017.

PETER S. HOLMES
Seattle City Attorney

LAW OFFICE OF THOMAS G.
JARRARD, PLLC

By: s/ David Bowman
DAVID BOWMAN, WSBA #28523
Assistant City Attorney
Seattle City Attorney's Office
701 Fifth Ave., Suite 2050
Seattle, WA 98104-7097
Fax: (206) 684-8284
Ph: (206) 684-0374
david.bowman@seattle.gov

By: s/ Thomas G. Jarrard
THOMAS G. JARRARD, WSBA #39774
Consent for signature obtained via e-mail
Law Office of Thomas G. Jarrard, PLLC
1020 N. Washington Street
Spokane, WA 99201
Ph: (425) 239-7290
tjarrard@att.net

Attorneys for Defendant City of Seattle

CROTTY & SON LAW FIRM, PLLC

By: s/ Matthew Z. Crotty
MATTHEW Z. CROTTY, WSBA #39284
Consent for signature obtained via e-mail
Crotty & Son Law Firm, PLLC
905 West Riverside, Suite 409
Spokane, WA 99201-0300
Ph: (509) 850-7011
matt@crottyandson.com

Attorneys for Plaintiff

ORDER

Based on the foregoing stipulation of the parties and good cause appearing, **NOW, THEREFORE,**

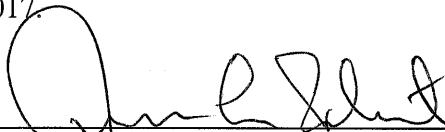
IT IS ORDERED that the Order Regarding Initial Disclosures and Joint Status Report dated December 8, 2017, is amended as follows: The Court sets the following dates for initial disclosure and submission of the Joint Status Report and Discovery Plan:

Deadline for FRCP 26(f) Conference: 1/12/2018

Initial Disclosures Pursuant to FRCP 26(a)(1): 1/26/2018

Combined Joint Status Report and Discovery
Plan as Required by FRCP 26(f)
and Local Civil Rule 26(f): 2/2/2018

DATED this th13 day of December, 2017.



James L. Robart, Judge
U.S. District Court
Western District of Washington

Presented by:

PETER S. HOLMES
Seattle City Attorney

LAW OFFICE OF THOMAS G.
JARRARD, PLLC

By: s/ David Bowman
DAVID BOWMAN, WSBA #28523
Assistant City Attorney
Seattle City Attorney's Office
701 Fifth Ave., Suite 2050
Seattle, WA 98104-7097
Fax: (206) 684-8284
Ph: (206) 684-0374
david.bowman@seattle.gov

By: s/ Thomas G. Jarrard
THOMAS G. JARRARD, WSBA #39774
Consent for signature obtained via e-mail
Law Office of Thomas G. Jarrard, PLLC
1020 N. Washington Street
Spokane, WA 99201
Ph: (425) 239-7290
tjarrard@att.net

Attorneys for Defendant City of Seattle

CROTTY & SON LAW FIRM, PLLC

By: s/ Matthew Z. Crotty
MATTHEW Z. CROTTY, WSBA #39284
Consent for signature obtained via e-mail

Crotty & Son Law Firm, PLLC
905 West Riverside, Suite 409
Spokane, WA 99201-0300
Ph: (509) 850-7011
matt@crottyandson.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that, on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the below-listed:

- Thomas G. Jarrard, TJarrard@att.net
- Matthew Z Crotty, matt@crottyandson.com, matthew.z.crotty@msn.com
- David Bowman, david.bowman@seattle.gov

In addition, I certify that I forwarded a copy of the proposed order, in Word format, to Judge Robart at: robartorders@wawd.uscourts.gov.

DATED this 12th day of December, 2017, at Seattle, Washington.

s/ Kim Fabel
KIM FABEL

STIPULATION AND ORDER AMENDING ORDER REGARDING
INITIAL DISCLOSURES AND JOINT STATUS REPORT
(C17-01709-JLR) - 4

Peter S. Holmes
Seattle City Attorney
701 Fifth Avenue, Suite 2050
Seattle, WA 98104-7097
(206) 684-8200